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8 UNITED STATES DISTRICT COURT
9 SOUTHERN DISTRICT OF CALIFORNIA
10 (Honorable Louisa A. Porter)

11 UNITED STATES OF AMERICA,)	CASE NO. 08MJ1115 BLM
)	
)	
12)	
)	Plaintiff,
13)	NOTICE OF MOTION; MOTION FOR
)	VIDEOTAPE DEPOSITION AND
14 vs.)	SUBSEQUENT VOLUNTARY DEPORTATION
)	OF MATERIAL WITNESS; MEMORANDUM
15 Mariano Garcia-Barrera,)	OF POINTS AND AUTHORITIES AND
)	DECLARATION OF THOMAS G. GILMORE
16)	IN SUPPORT THEREOF
)	
)	DATE: May 8, 2008
17)	TIME: 2:30 p.m.
)	PLACE: Courtroom of Magistrate
18)	Louisa A. Porter

19 TO: UNITED STATES ATTORNEY; DEFENDANTS AND THEIR ATTORNEYS OF
20 RECORD:

21 PLEASE TAKE NOTICE that on May 8, 2008 at 2:30 p.m. or as soon
22 thereafter as the matter may be heard, material witnesses
23 Constantino Escamilla-Ortiz, Antonio Valenzuela-Gonzalez, Guillermo
24 Mata-Valles and Alcelmo Sanchez-Salazar will move the Court for an
25 Order that they be subjected to a videotape deposition prior to
26 trial and subsequent voluntary deportation.

27 This motion will be based on 18 U.S.C. 3144 in that the
28 witnesses testimony can be adequately secured by deposition and

1 further detention is not necessary to prevent a failure of justice.

2 This motion is further based on this notice of motion, the
3 memorandum of points and authorities and declaration of Thomas G.
4 Gilmore filed herewith, and as such other and further evidence as
5 may be presented at the hearing of the motion.

6 Respectfully submitted,

7 DATED: 4/30/08

8 /ss/Thomas G. Gilmore
THOMAS G. GILMORE, Attorney for
Material Witnesses

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